

# EXHIBIT B



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June 19, 2019

**BY EMAIL**

Emma Lerner Freeman, Esq.  
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Re: Clark, et al. v. The City of New York, 18-CV-2334 (AT)(KHP)

Counsel:

Defendant writes in response to plaintiffs' letter, dated April 26, 2019, regarding methods for identifying members of the putative class in the above-referenced matter.

In response to plaintiffs' request "that the City provide us with a comprehensive list of all arrest documents that reference an arrestee's headgear," defendant states that the Arrest Report, Complaint Report, and Online Prisoner Arraignment Form ("OLPA") provide the ability to reference an arrestees' headgear. The Arrest Report and Complaint Report provide the ability to reference an arrestees' headgear in a drop-down menu option and/or a free-form data entry. The Arrest Report and Complaint Report are both searchable for keywords.

In response to plaintiffs' request that "the City indicate whether the initial Prisoner Movement Slip Photographs are retained in any of the following databases, even if they are deleted or replaced elsewhere," defendant is currently verifying which database, if any, retain the initial Prisoner Movement Slip Photographs. Defendant will supplement this response once this inquiry is completed.

If you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

/s

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Bilal Haider  
Senior Counsel

cc: **VIA E-MAIL**

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Albert Cahn, Esq.  
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